UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

IN RE SONUS NETWORKS, INC. SHAREHOLDER DERIVATIVE LITIGATION)	Case No. 04-10359-DPW
)	

DEFENDANTS' MOTION FOR LEAVE TO TO FILE NOTICE OF SUPPLEMENTAL AUTHORITY

The defendants, Edward T. Anderson, Paul J. Ferri, Albert A. Notini, Paul J. Severino, Hassan Ahmed, Rubin Gruber, Paul R. Jones, Edward N. Harris, J. Michael O'Hara and Stephen J. Nill and nominal defendant Sonus Networks, Inc. (the "Defendants"), hereby move for leave to file a Notice of Supplemental Authority to bring to the Court's attention the following supplemental authority issued near the time or after the close of briefing on the Defendants' Motions to Dismiss, now scheduled for oral argument on December 7, 2005:

- 1. <u>Sachs v. Sprague</u>, -- F. Supp. 2d--, 2005 WL 3116952 (D. Mass. Nov. 22, 2005);
- 2. <u>Steinberg v. Sonus Networks, Inc.</u>, No. 02-11315-MLW (D. Mass. Oct. 5, 2005); and
- 3. Neer v Pelino, 389 F. Supp. 2d 648, 655, 657 (E.D. Pa. Sept. 27, 2005).

Respectfully submitted,

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Dated: December 1, 2005

CERTIFICATE OF CONFERENCE

I hereby certify that counsel for the parties conferred in an attempt to narrow or resolve the issues presented in this motion, and could not narrow or resolve the issues.

/s/ Gregory F. Noonan

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Defendants' Motion for Leave to File Notice of Supplemental Authority was served on all counsel of record either electronically or by first-class mail this 1st day of December, 2005.

/s/ Gregory F. Noonan